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May 10, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities. CG Docket No. 03-123 & CG Docket No. 10-51

Dear Ms. Dortch:

On April 25, 2012 the Commission received written correspondence from Mr. Earl Weston, an employee at Allstate Corporation (“Allstate”), referencing Purple Communications, Inc.’s (“Purple’s”) provision of relay services to Allstate and its employees, and Purple’s ex parte filing with the Commission on March 27, 2012. Very simply, Mr. Weston has confused the issues of VRS and VRI services as discussed in Purple’s March 27 filing.

For the avoidance of doubt, Purple provides VRS services to employees of Allstate who choose to use Purple VRS, but there is no contract with Allstate (nor with any other entity) to provide VRS services. Purple does, however, contract with Allstate to provide VRI services to the company directly, to service its non-TRS interpreting needs.

Mr. Weston is correct in his reference to Purple’s statements to its VRS customers employed at Allstate that they are not able to select interpreters, as that practice is prohibited by current FCC rules. Mr. Weston’s letter, however, reinforces the recent proposal advanced by consumer groups in the VRS Reform Rulemaking Docket (Docket #10-51 and #03-123), that VRS users should be permitted to select and designate preferred CAs in certain circumstances. While Purple is prohibited from accommodating Mr. Weston’s request under current rules, Purple continues to strongly support his and the consumers’ underlying positions regarding the critical importance of technology and interpreter quality for relay use in the workplace. Purple believes these issues must be addressed in the current VRS Reform rulemaking process, as their profile will continuously increase as more Deaf and Hard of Hearing Americans enter and succeed in the workplace.

Finally, Mr. Weston correctly recites Purple’s statement on the record that its VRS customers, including those employed at Allstate, are free to use any VRS provider they choose. This statement remains correct. Mr. Weston, like any of Purple’s VRS customers, is under no obligation to use Purple VRS and is free to cease use of our services at any time. No agreement between Purple and Allstate exists that would operate to limit this freedom, which remains a core tenant of the VRS industry.

Purple takes seriously its mandate under the TRS rules to educate individuals about the capabilities of VRS services, and applauds Allstate and other companies that have demonstrated leadership in utilizing services such as VRS to carry out the objectives of the ADA in creating an accessible workplace. Purple will continue to support those companies’ efforts, and their Deaf and Hard

of Hearing employees, through the provision of world-class relay services delivered in compliance with all applicable FCC regulations, and in accordance with the mandate of the ADA.

Finally, if the Commission concludes that ambiguity exists under current FCC regulations relating to the manner in which VRS providers may support the efforts of companies seeking to employ VRS users, Purple encourages the Commission to adopt a strong, clear position on this topic that underscores the reality that VRS services and the TRS Fund exist for the express purpose of providing equal opportunities, including the opportunity to be gainfully employed, to Deaf and Hard of Hearing Americans

Purple restates its invitation to the Commission to discuss Purple's practices as detailed above at any time. The Company welcomes further dialogue on this topic as desired by the Commission.

Sincerely,

PURPLE COMMUNICATIONS, INC.

A handwritten signature in dark ink, appearing to read 'JGLL', is positioned above the printed name of John Goodman.

John Goodman  
Chief Legal Officer

CC: Sean Lev, OGC  
Karen Peltz Strauss, CGB  
Bob Aldrich, CGB  
Gregory Hlibok, CGB